To: Mike Hackney[mhackney@pgei.com]

From: Suchomel, Bruce

Sent: Fri 2/10/2017 10:10:16 PM

Subject: RE: Maj Mod Draft; Antelope Creek

Mike, only TS4S R3W USM sections 33&34 are added (not section 32).

Bruce

From: Mike Hackney [mailto:mhackney@pgei.com]

Sent: Friday, February 10, 2017 9:51 AM

To: Suchomel, Bruce <Suchomel.Bruce@epa.gov> **Subject:** RE: Maj Mod Draft; Antelope Creek

Thanks for looking through your files, if you didn't see anything else, then good enough. I was just surprised that we were on MM#8.

The carve-out is fine—that's kinda the law—and oil companies shouldn't go around just destroying things.

Mike

From: Suchomel, Bruce [mailto:Suchomel.Bruce@epa.gov]

Sent: Friday, February 10, 2017 9:05 AM

To: Mike Hackney < mhackney@pgei.com >
Subject: RE: Maj Mod Draft; Antelope Creek

Hi Mike,

Thanks for reviewing this draft so quickly. I do see the T4S R3W modification in the Antelope Creek map, outlined with a green boundary, and will include that with the draft modification language for our website's public notice.

My review of the past modifications shows no additional land to this area permit. With that said I will conduct another review of past modifications early next week – if I find anything to the contrary I'll let you know.

I do want to point out that in order to get this modification through our legal department's NHPA expert, I needed to "carve out" the avoidance areas from the modification.

Bruce Suchomel
Environmental Engineer, UIC Program
USEPA Region 8 (8WP-SUI)
1595 Wynkoop St.
Denver, CO 80202-1129
303-312-6001

From: Mike Hackney [mailto:mhackney@pgei.com]

Sent: Thursday, February 09, 2017 11:20 AM

To: Suchomel, Bruce < <u>Suchomel.Bruce@epa.gov</u>> **Subject:** RE: Maj Mod Draft; Antelope Creek

Bruce,

Looking though this, I see an issue with the legal description because the final description does include lands from prior major modifications to the permit.

In the 1996-1998 timeframe there was a modification to the permit that brought in TS4S R3W USM sections 33&34 (and I believe 32 although we have no injectors in that section).

The language of this mod should read something like Original Permit Area (July 14, 1994, as amended 199X). Showing all the acreage under the previous mod(s).

We have very incomplete records of the modifications to this permit and with over 20 years having passed, I was not aware of there having been 7 previous major modifications. I was aware of two. I know we did one mod to clean up the confining zone language and another to add sections 33 & 34, but I have no idea what the other five would have been for.

There may have been additional lands added that I am was aware of (including section 36, the subject of the current mod)

Could you quickly review those other mods to see if any other lands have been added previously (including section 36).

And if you sent this to me earlier and I missed it, I apologize for not catching it then.

Mike

208-685-7630

From: Cline, Carolyn [mailto:Cline.Carolyn@epa.gov]

Sent: Thursday, February 09, 2017 8:39 AM **To:** Mike Hackney <<u>mhackney@pgei.com</u>>

Cc: <u>shaunc@utetribe.com</u>; <u>edreds@utetribe.com</u>; <u>reannint@utetribe.com</u>; <u>Bartholomew.stevens@bia.gov</u>; <u>BartP@utetribe.com</u>; <u>bpargeets@utetribe.com</u>;

bradhill@utah.gov; utvnmail@blm.gov

Subject: FW: Maj Mod Draft; Antelope Creek

UT20736-00000; area permit expansion

Sent: Thursday, February 09, 2017 8:28 AM

Subject: FW: petroglyph

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